



U.S. Department of Justice
United States Attorney
District of New Jersey

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March 6, 2025

VIA CM/ECF

Honorable Michael E. Farbiarz
United States District Judge
U.S. Post Office & Federal Courthouse
Newark, New Jersey 07102

Re: United States v. Gordon Coburn and Steven Schwartz
Crim. No. 19-120 (MEF)

Dear Judge Farbiarz:

The Government respectfully submits this letter pursuant to the Court's March 3, 2025 order (ECF No. 928) permitting the Government to file a letter seeking admission of the additional Pune-related materials. The Government hereby seeks to admit such materials and incorporates its prior briefing on the matter (ECF Nos. 754, 841). As set forth therein, the Government respectfully submits that the motion should be granted because (1) Rule 404(b) is not implicated, as the Government will not elicit that Srimanikandan Ramamoorthy can recall speaking to Defendant Coburn about the bribe demand relating to the Pune campus and reimbursement

through the change order process (only that it is possible he did so); (2) the Pune-related evidence is highly relevant as the blueprint for the Defendants' commission of the charged scheme; and (3) the evidence poses no 403 concerns, particularly as parties have already agreed that some evidence concerning the Pune-related bribe and reimbursement will be admissible at trial and additional evidence is extremely limited, comprising of brief testimony from Mr. Ramamoorthy and Dana Gilbert and three additional emails.

Respectfully submitted,

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Acting Chief

JOHN GIORDANO
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/s/ Keith D. Edelman
/s/ Connor Mullin
/s/ Paul G. Ream

/s/ Rachelle M. Navarro

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